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August 14, 2015

By ECF and E-mail

Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007-1312

Re: Elizabeth Melendez v. The Department of Homeless Services
of the City of New York
14 CV 06024 (AT)

Dear Judge Torres:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for Defendant the City of New York S/H/A the Department of Homeless Services of the City of New York in the above-referenced action. I am writing to request respectfully a 45-day extension of time to file a response to the complaint, and a related adjournment of the initial conference and date for submission of the proposed Scheduling Order. Defendant's answer is due on September 1, 2015. As proposed herein, Defendant will respond to the complaint on or before October 16, 2015. This is Defendant's first request for an extension of time. Plaintiff's counsel has consented to the requested extension.

The extension is requested because I was recently assigned to this matter and need time to familiarize myself with the file, obtain the necessary documents and interview the individuals alleged to be involved. The initial pre-trial conference is currently scheduled for October 19, 2015. In accordance with Paragraph II.B of your Honor's Individual Practices, the parties have been ordered to submit a Proposed Case Management Plan and Scheduling Order by October 15, 2015. Should the Court grant Defendant the requested extension, Defendant requests that the conference and associated deadline be adjourned to a time convenient for the Court after Defendant responds to the complaint.

Thank you for your consideration of this request.

Respectfully submitted,

By: /s/
Kristen M. McIntosh
Assistant Corporation Counsel

cc: Walker Green Harman, Jr.
Ronnie L. Silverberg
Edgar Mikel Rivera
THE HARMAN FIRM P.C.
Attorneys for Plaintiff
(By ECF)